## 1 IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA 2 WILKES-BARRE DIVISION 3 4 Case No. 18-03113 (JJT) In re: 5 **CORY DAVID SEIP** Chapter 13 6 VERONICA SEIP 7 **OBJECTION TO CONFIRMATION** 8 9 10 Wells Fargo Bank, N.A. ("Wells Fargo"), a secured creditor of the Debtors, objects to the 11 Debtors' plan for the following reasons: 12 A. The plan does not deal with/does not mention Wells Fargo in regards to the 13 14 **2012 Fiat 500**. Wells Fargo objects, on the basis that if the plan were to complete 15 early, and complete before the loan maturity date of the Debtors' secured loan with 16 Wells Fargo, there is a risk that the Debtors will take the position that their loan with 17 Wells Fargo has been discharged under §1325. To resolve this issue, the plan should 18 19 be amended to include Wells Fargo in section 2(B), to provide that the claim of Wells 2.0 Fargo is unaffected by the plan and will not be discharged upon completion of the 21 plan. 2.2 23 24 /s/ William E. Craig William E. Craig, attorney for 25 Wells Fargo Bank, N.A. 26 Dated: 11/1/18 27 28

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